

**VIA ECF**

Hon. Lorna G. Schofield  
 United States District Court  
 Southern District of New York  
 Attn: Hon. Lorna G. Schofield, U.S.D.J.  
 500 Pearl Street  
 New York, NY 10007

By **July 14, 2021**, the parties shall submit a supplemental letter apprising the court of (i) the nature of the delay and scope of remaining discovery, (ii) the date by which parties intend to produce responsive documents currently in their possession, (iii) the number of responsive documents currently in their possession that have not been produced, (iv) the names and roles of any witnesses to be deposed, (v) dates for the depositions of those witnesses and (vi) any interim discovery deadlines the parties have set, such as deadlines for interrogatories or requests to admit.

Dated: July 9, 2021

New York, New York

Re: *Edelman v. NYU Langone Health System, et al.*,  
 Case No. 1:21-cv-00502 (LGS) (GWG)



LORNA G. SCHOFIELD  
 UNITED STATES DISTRICT JUDGE

Dear Judge Schofield:

The parties write jointly pursuant to Rule I(B)(2) of this Court's Individual Rules and Procedures for Civil Cases to request an extension of the deadline to complete fact discovery set forth in paragraph 8(a) of the Civil Case Management Plan and Scheduling Order (Doc. No. 18) (the "Scheduling Order"). As this requested extension affects other scheduled dates contained in the Scheduling Order, the parties' new proposed dates are as follows:

Date	Current	Proposed
Deadline for completion of all fact discovery required by paragraph 8(a)	July 16, 2021	September 30, 2021
Deadline for completion of all expert discovery required by paragraph 9(b)	August 30, 2021	November 12, 2021 [45 days from the deadline for completion of all fact discovery]
Deadline to meet and confer on a schedule for expert disclosures required by paragraph 9(c)	June 16, 2021	August 30, 2021 [no later than one month before the deadline for completion of all fact discovery]
Deadline for the parties to submit a joint letter required by paragraph 13(b)	July 30, 2021	October 14, 2021 [14 days after the requested deadline for the close of fact discovery]
Pre-motion conference for any dispositive motions as set forth in paragraph 13(c)	September 16, 2021 <sup>1</sup>	November 29, 2021 [usually 14 days after the close of all discovery] or a date thereafter convenient for the Court

<sup>1</sup> In addition to the requested adjournment of this conference to correspond with the new proposed deadline to complete discovery, the parties also request an adjournment of this scheduled conference as September 16, 2021 falls on Yom Kippur (a Jewish High Holiday).

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July 8, 2021  
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This is the parties' first request to extend the deadline for the close of fact discovery and is necessitated, in part, by the fact that the parties have been working in good faith to resolve a number of discovery disputes and issues without the need for Court involvement. Additionally, the parties are still in the process of exchanging discovery.

This is also the parties' first request to adjourn the status conference.

The parties thank this Court for its time, attention, and consideration in this case.

Respectfully submitted,

Dated: Lake Success, New York  
July 8, 2021

**MILMAN LABUDA LAW GROUP PLLC**

Dated: New York, New York  
July 8, 2021

**TARTER KRINSKY & DROGIN LLP**

By: /s/ Emanuel Kataev

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